


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION


U.S. Magistrate Judge

MARTHA AXLEY,)	
)	
Plaintiff,)	
)	Case No. 3:12-cv-00951
v.)	Judge Campbell
)	Magistrate Judge Knowles
GALLATIN HEALTH CARE CENTER, LLC,)	Jury Demand
)	
Defendant.)	

MOTION TO EXTEND FACT DEPOSITION DEADLINE

Comes now the Plaintiff, by and through undersigned counsel, and hereby moves this Court for an extension of the deposition deadlines governing this case. Plaintiff's counsel will be filing a motion to withdraw as counsel after the requisite notice period outlined in Local Rule 83.01(g) expires on July 30, 2013. Although counsel for the parties had discussed and reserved some deposition dates that would comply with the current scheduling order deadline for fact witnesses of July 31, 2013, these dates fall within the 14 day notice period and Plaintiff has advised current counsel that she does not feel comfortable having current counsel defend and/or conduct the depositions on this case. Therefore, the Plaintiff needs additional time to conduct these depositions with new counsel or pro se. Adjusting this one fact witness deadline will not impact the dispositive motion deadline or current trial date. Plaintiff requests all other deadlines to remain the same, but that the fact witness deposition deadline be extended to November 29, 2013, which is one month prior to the current dispositive motion deadline. Plaintiff requests this extension so that she may have time to obtain new counsel and have that new counsel defend and conduct fact witness depositions in this case.